EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

VS.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

JANE DOE,

Plaintiff,

VS.

LIMESTONE UNIVERSITY F/K/A LIMESTONE COLLEGE, COLLINS MURPHY, MG FREESITES, LTD., d/b/a PORNHUB.COM, and HAMMY MEDIA, LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:20-cv-00947

AFFIDAVIT OF ESTEFANIA ZAPATA

Case No.: 7:21-cv-03193

AFFIDAVIT OF ESTEFANIA ZAPATA

- 1. I am Estefania Zapata. I am over the age of eighteen years of age, am a resident of Osceola County and hereby affirm upon oath and affirmation that the following matters, facts, and statements are true and correct to the best of my knowledge.
- 2. I am a paralegal at Metcalfe & Atkinson, LLC. I have been employed as a paralegal handling federal civil and criminal matters for Hannah Rogers Metcalfe and Courtney

C. Atkinson since May 2017. I am writing this Affidavit to confirm the timely actions taken

when electronically filing Wisebits IP, LTD's Motions for Protective Orders in the above-

referenced matters.

As the civil law paralegal, I was "assigned" the case for Wisebits IP, LTD when 3.

Hannah Rogers Metcalfe was engaged as local counsel for Wisebits IP, LTD.

As part of my assignment, I am responsible for preparing the pleadings for

electronic filing with the District Court via ECF.

On February 28, 2024 around 10:35 p.m., I commenced to assist Mrs. Metcalfe

with the preparation and electronic filing of Wisebits IP, LTD's Motions for Protective Order.

Around 11:40 p.m., when attempting to electronically file the Motions for

Protective Order with the District Court, I started receiving a filing error that did not allow me to

successfully complete the filings. A screenshot of the error message I received is attached hereto

as Exhibit A.

7. Given that I kept receiving this error repeatedly, I informed Mrs. Metcalfe of such

error around 11:55 p.m. after multiple unsuccessful attempts to resolve the problem with the ECF

system.

8. I was able to complete both electronic filings at 12:13 a.m. and 12:14 a.m.

FURTHER, AFFIANT SAYETH NOT.

Paralegal at Metcalfe & Atkinson, LLC

SWORN, and SUBSCRIBED TO

This 20th day of March, 2024

Solida Ollards

NOTARY PUBLIC FOR FLORIDA My Commission Expires: 12002, 2024

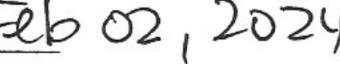




EXHIBIT A



Motions

7:20-cv-00947-DCC Does 1-9 v. Murphy et al

JURY

ERROR: Document is malformed or contains code which may cause an external action (such as launching an application). This PDF document cannot be accepted.

Click here for more information.

If you need further assistance, please contact the court.

Error File: C:\fakepath\Wisebits Ex. 2 - Response.pdf

Submitted Entries

| File Type | Filename | Category | Description |
|---------------|---|----------|-------------|
| Main Document | C:\fakepath\WIPs Motion for Protective Order .pdf | _ | 2 |
| Attachment #1 | C:\fakepath\Wisebits Ex. 2 - Response.pdf | Exhibit | 2 |

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